

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA, : 07-Cr-1015 (LAK)  
: :  
-against- : : **NOTICE OF MOTION**  
: :  
MICHAEL DEDE, : :  
: :  
Defendant. : :  
: :  
----- X -----

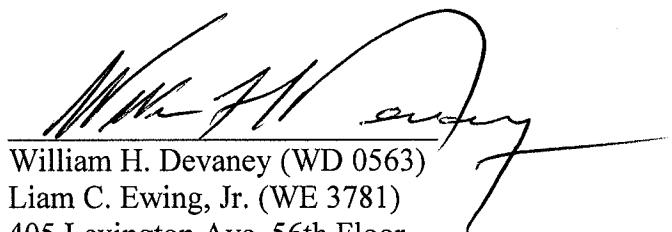
**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, dated December 4, 2007, defendant Michael Dede, through his undersigned counsel, will move this Court, before the Honorable Lewis A. Kaplan, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, Courtroom 12D, on December 20, 2007, at 9:30 a.m., or at any other time to be set by the Court, for an order: (1) requiring the government to produce Brady/Giglio material as early as possible, and no later than one month before trial, pursuant to this Court's discretionary case management authority; (2) requiring the government to review the personnel files of all testifying law enforcement officers and to produce any impeachment material found therein; (3) requiring the government to inquire of all federal and participating State law enforcement agencies whether the cooperating witnesses have confidential informant files and, if so, to review those files and produce

any impeachment material found therein; and (4) any other and further relief that this Court deems just and proper.

Dated: New York, New York  
December 4, 2007

VENABLE LLP

By:

  
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